

EXHIBIT A

McNamara, Anthony P.

From: Cornett, Jason
Sent: Wednesday, June 12, 2019 2:41 PM
To: Schaeper, Tia; Weber, Mark
Cc: Whyte, Chelsea
Subject: RE: Eran Evans

If Tia's comfortable, then so am I. Sounds like we're picking up a great candidate!

Jason Cornett
M 513.368.8312
jason.cornett@hillmangroup.com

From: Schaeper, Tia
Sent: Wednesday, June 12, 2019 1:41 PM
To: Weber, Mark <Mark.Weber@hillmangroup.com>
Cc: Whyte, Chelsea <Chelsea.Whyte@hillmangroup.com>; Cornett, Jason <Jason.Cornett@hillmangroup.com>
Subject: RE: Eran Evans

Because I have Caity it's not as bad... wish it were sooner but I think we can manage

From: Weber, Mark
Sent: Wednesday, June 12, 2019 1:40 PM
To: Schaeper, Tia
Cc: Whyte, Chelsea; Cornett, Jason
Subject: RE: Eran Evans

Offer made, she has requested a start date of July 15, any issues? I hope not!

From: Schaeper, Tia
Sent: Wednesday, June 12, 2019 11:16 AM
To: Weber, Mark <Mark.Weber@hillmangroup.com>
Cc: Whyte, Chelsea <Chelsea.Whyte@hillmangroup.com>; Cornett, Jason <Jason.Cornett@hillmangroup.com>
Subject: Eran Evans

Mark,

I liked Eran and would like to extend an offer for her to be on my team as a supply planner.

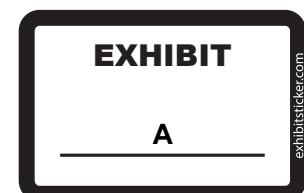
Jason was not available to speak with her but was impressed by her resume and (hopefully) trusts my judgment ;)

Can we please proceed?

Jason if you would prefer you chat with her on the phone or something before we extend let us know

Thanks!

Tia Schaeper | Manager, Supply Chain Planning- Home Segment



HILL-EVANS-000554

EXHIBIT B



Job Code:	21597
Job Title:	Supply Planner
FLSA Status:	Exempt
Job Family:	Supply Chain
Job Function:	Category Planning
Level:	IC5

Summary

Supports the organization's supply chain operations through purchasing and coordinating the movement of raw materials and finished goods to ensure that production and sales expectations are met. Responsible for evaluating and owning timely PO placement, inventory levels and customer on time delivery KPIs are achieved. Monitor & communicate supplier price variances impacting margin and quality issues as they occur. Escalate any issue putting the companies KPIs at risk.

Duties and Responsibilities*

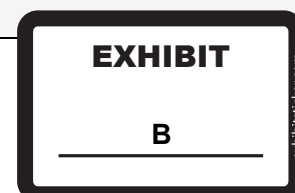
- Administers strategies meant to optimize inventory levels, achieve customer fill rates, support business objectives, mitigate supplier risks and drive KPI's.
- Manages vendor relationships to support on time supplier delivery as directed by sourcing staff and defined by contract.
- Submits and accurately documents all purchase orders in order to ensure a continuous supply of goods. Supplier lead times need to be monitored and adhered to. PO pricing accuracy is expected.
- Proactively collaborates and communicates with department and company leadership to identify and implement continuous improvement initiatives.
- Accountable for managing Inventory Goals for assigned categories to ensure proper levels are maintained thru Purchase Order expedite and deferral activities.
- Accountable for maintaining performance on Customer Fill Rates for assigned categories at corporate established goals thru standard (expedites and deferrals) and alternate (stock balance, fill in work orders, repack) supply chain methods.
- Participates on dead and excess inventory team to develop remediation efforts.
- Manages and updates master data in coordination with manager (MOQ, lead time, etc.).
- Travels domestically and internationally as needed.

*All other duties as assigned.

Education & Experience

Created By: Colin Kunath

11/9/2017



Version: 1

HILL-EVANS-000636

Education & Experience

A/O	Pref/Req	Education	Degree	A\O	Experience
	Req	BS/BA	Business analysis	And	3-5 years of experience in related field
Or	Req	BS/BA	Supply Chain Mngt	And	3-5 years of experience in related field
Or	Pref	MS/MA/MBA	Related Field		

Additional Experience & Certifications**Knowledge**

Team member demonstrates

Skill Level	Skill
Strong	Written and Verbal Communication Skills
Strong	Interpersonal Skills
Strong	Persuasive Reasoning & Negotiation Skills
Strong	Skills in Teamwork & Collaboration

Self Management

Ability to Solve Problems
 Ability to Accept & Act on Constructive Criticism
 Ability to Manage a Large Workload
 Ability to Work Independently
 Ability to be flexible and adapt to change
 Analytical and detailed oriented

Strong Skills in Microsoft Office: Word, Excel, Outlook, and PowerPoint

Other Skills

- Understanding of international freight, currency exchange rates, and US customs regulations.
- Knowledge of ERP system processes for planning production, inventory control and purchasing systems.
- Knowledge of supplier management and qualification process.
- Understands Lean Supply Chain Concepts.

Work Environment

Office Personnel-Office setting and seldom exposed fumes or airborne particles loud working environment of the shop area. Functional vision and hearing required. Physical Demand: Sedentary

EXHIBIT C



HILLMAN

Employee Handbook

EXHIBIT

C

exhibitstickers.com

HILL-EVANS-000592



Welcome to The Hillman Group, we are glad to have you as a member of our ever-growing team. At Hillman we are One Team with One Goal - Customer First. Our employees strive to live our corporate values every day:

- 1) **Absolute integrity.** There is right and there is wrong; there is no grey. We will always support you if you are doing the right thing.
- 2) **Team success over individual success.** A team can't be successful long term if the individuals on it put themselves first. If we put team success first, my experience says there will be plenty of room for individual success as well. We want you to succeed but the order is critical; team first and then individual.
- 3) **Nothing happens until you sell something.** The reason Hillman is one of the best companies EVER at this is thanks to Mick & Rick Hillman. What we have to remember is that our job is to make sure our customers, shareholders and employees are successful. There will be different times where one demands more attention than the other. It's a hard balance, but we can do it!

To help you understand how we work together, we have prepared this Employee Handbook. It will answer many of the questions you may have, however, if you need further explanation or can't find the answer, please ask your supervisor or a member of your Human Resources team.

We hope that your experience at The Hillman Group will be challenging, enjoyable and rewarding.

Sincerely,

Doug Cahill, President & Chief Executive Officer

Company History

Established in 1964 by Max W. Hillman, Sr., The Hillman Group has enjoyed over five decades serving the hardware/home improvement industry. Our company is widely known for the outstanding service and quality products that we provide. The Hillman Group has grown to a global distributor dedicated to customer service. Hillman is focused on cultivating the company's "neighborhood" feel by partnering with our customers at a local level and helping to further their successes.

While Hillman was founded as a fastener company, we have branched out into a diverse entity serving the consumers' everyday needs with common products for commercial and residential uses, as well as offering service and merchandising aids. Hillman's customer portfolio, over 21,000 strong, includes Ace Hardware, True Value, Lowe's, Home Depot, Tractor Supply, Walmart, Menards, Do it Best Corp., and many more.

Sales & Service

As a company, service is the hallmark of The Hillman Group. The Company employs the largest factory direct sales force in today's industry. In total, the Sales/Service Organization consists of over 700 people including sales personnel, field representatives, and managers. The depth of the sales and service team enables Hillman to maintain consistent call cycles, ensuring that all of their customers will experience proper stock levels and inventory turns. This team can also build specific planograms to fit the needs of any store, as well as customizing programs that will meet consumers' requirements for pricing, invoicing, and computer needs. This unique group also benefits from daily internal support from the inside sales and customer service teams.

Product Selection

The Hillman Group is the leader in today's market in fasteners, keys, letters, numbers, signs (LNS), engraving and personal protection and work gear products. Hillman is also the industry leader with the ability to market, package, and sell 50,000 SKU's.

Fasteners remain the core of Hillman's business with the product line encompassing standard and specialty nuts, bolts, washers, screws, anchors, picture hanging items, and more.

Keys and Letters, Numbers and Signs lines offer a full complement of product for home and commercial use. Hillman's **Engraving** programs allow customers to create affordable, custom engraved ID tags in minutes. Tags come in a variety of materials, finishes and shapes including a licensed sports line.

Personal Protection and Work Gear Products has broad portfolio ranging from knee pads, tool belts, jobsite storage and work gloves that deliver innovative solutions to the Home, Automotive and Hardware industries.

Markets and Customers

Hillman sells its products to national accounts such as Walmart, The Home Depot, Lowe's, Sears, Tractor Supply, PetSmart, Grainger, Menards and PETCO. Hillman's status as a national supplier of unique, proprietary products to Big Box retailers allows them to maintain a strong market position within its product categories.

Hillman services approximately 15,000 franchise and independent ("F & I") retail outlets. These individual dealers are typically members of larger cooperatives, such as True Value, Ace Hardware, and Do it Best Corp. The Company sells directly to the cooperative's retail locations and supplies many fastener items to the cooperative's central warehouses. These central warehouses distribute to their members that do not have a requirement for Hillman's in-store service. These arrangements reduce risk, credit, and logistic expense for Hillman and reduce central warehouse inventory and delivery costs for the cooperatives.

Innovation

Whether in Distribution, Key Duplication, or Sales and Service, The Hillman Group is known for their innovation. Many of Hillman's distribution centers employ the very latest in Warehouse Management Systems software, allowing paperless order picking. Technology used to engineer our Axxess Key Duplication System has revolutionized the metal key duplication process giving consumers a virtually foolproof system. Our Sales and Service teams are equipped with the best technology for taking, tracking, and transporting customer orders.

Operations

Hillman's operational infrastructure consists of over 15 distribution/manufacturing facilities located throughout the U.S., Canada, and Mexico. These facilities combined can accommodate over 5,000 orders and 300,000 lines per day. Hillman has a 24-hour process time from order receipt to product shipment with a 97% fill rate.

Employment

Hillman employs over 3,000 individuals across the U.S. and Canada. We have a solid group of professionals whose dedication and teamwork form the backbone of our company. Hillman continually strives to hire associates that meet our standards for interpersonal skills and strong work ethic.

Community Involvement

The Hillman Group believes that giving back to the community greatly improves the health and wellness of others and instills a sense of pride in our employees. We're dedicated to giving back across the country, especially in the communities where Hillman does business.

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Hillman Employee Handbook Introduction

This handbook is intended to acquaint you with The Hillman Group. It explains some of the company's philosophies and beliefs and describes, in general terms, some of the employment guidelines. We hope that it will serve as a useful reference document throughout your employment with the company. Also, please understand that the handbook is not intended to be a contract (express or implied), nor is it intended to otherwise create any legally enforceable obligations on the part of the company or its employees. Hillman is an "at will" employer. All employees, regardless of status or time with Hillman, are considered "at will" employees. This handbook supersedes and replaces all previous policies, practices, and guidelines.

Because the company is a growing and changing organization, it reserves full discretion to add to, modify, or delete provisions of this handbook, or the policies and procedures on which they may be based, at any time, without advance notice. For this reason, we urge you to check with the Chief Human Resources Officer (CHRO) to obtain current information regarding the status of any particular policy, procedure, or practice.

This handbook is the property of the Hillman Group, and it is intended for your personal use and reference as an employee of the company.

Hillman endeavors to comply with all applicable Federal, State, and Local regulations where it conducts business, but since Hillman does business in all States and internationally, compliance with certain regulations will not necessarily be specifically addressed in this Handbook.

All employees are expected to read, understand and comply with all provisions of this handbook. If you have any questions, feel free to contact your supervisor or the Human Resources Department.

Please accept and acknowledge this handbook utilizing the Employee Self-Service website. This will provide the company with a record that you have received the handbook. Printed copies are also available upon request.

This Employee Handbook, issued December 2019, supersedes all existing employee handbooks and policies. It may not be amended or expanded without the express written approval of Hillman's President & Chief Executive Officer (CEO), Chief Financial Officer (CFO), Chief Human Resources Officer (CHRO), or General Counsel and Secretary.

Hillman Employee Handbook **Electronic Signature Acknowledgement**

The Employee Handbook describes important information about Hillman. I have entered into my employment relationship with Hillman voluntarily and acknowledge that there is no specified length of employment. Accordingly, either Hillman or I can terminate the relationship at will, with or without notice or cause, at any time, so long as there is no violation of applicable federal or state law.

Since the information, policies, and benefits described here are necessarily subject to change, I acknowledge that revisions to the handbook may occur, except to Hillman's policy of employment-at-will. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify or eliminate existing policies. Only Hillman's President and CEO, CFO or CHRO has the ability to adopt any revisions to the policies in this handbook. Furthermore, I acknowledge that this handbook is neither a contract of employment nor a legal document.

I acknowledge and understand that I am responsible for reading and complying with the policies contained in the Employee Handbook as well as any revisions that follow. The Handbook is available on the Employee Self-Service website under the Company Documents section. Printed copies are available upon request.

For those who have been assigned access to Hillman computer systems: I acknowledge that I am aware that The Hillman Group, Inc. Information Security Policy is available in the corporate library on the Hillman Portal. By signing this document, I further accept responsibility to review the Policy and comply with the procedures and guidelines as described in the Policy.

I understand that The Hillman Group retains the right to deny all network access privileges to me and to terminate my employment if I do not sign this consent. If I sign this consent and then later revoke it, The Hillman Group retains the right to revoke my network access privileges as of the date of my revocation and to subsequently terminate my employment.

By acknowledging and accepting this document, I hereby agree to comply with the procedures and guidelines as described in The Hillman Group Information Security Policy.

This Employee Handbook, issued December 2019, supersedes all existing employee handbooks and policies. It may not be amended or expanded without the express written approval of Hillman's President and CEO, CFO or CHRO.

Employment Policies and Practices

Employment at Will

Hillman is an "at will" employer. All employees, regardless of status or time with Hillman, are considered "at will" employees. Hillman employees are expected to meet and maintain standards of acceptable job performance and behavior and Hillman reserves the right to dismiss any employee at any time for any reason, so long as there is no violation of applicable federal or state law. Hillman is not able to guarantee employment for any specified length of time, nor is it able to guarantee any certain annual compensation to any employee.

Periodically, it may be in the best interest of Hillman to terminate employees on either an individual basis or during a reduction of the work force. Hillman reserves the right to make these decisions at its sole discretion. In a like manner, any employee may elect to terminate his or her employment with Hillman at any time, subject to the reasonable notice requirements found elsewhere in these policies.

No manager or other representative of Hillman, other than its President & CEO or General Counsel and Secretary has any authority to provide any assurance of job security, a fixed term or period of employment, guaranteed annual compensation, or continued employment to applicants or to any employees, and any such agreement must be in writing and signed by such President & CEO or General Counsel and Secretary in order to be binding on Hillman.

Equal Employment Opportunity

It is the policy of Hillman to provide equal employment opportunities in all aspects of employment, including recruitment, hiring, compensation, promotion, evaluation, discipline, and other terms and conditions of employment. Hillman will not tolerate discrimination based upon and will make employment decisions without regard to race, color, age, religion, sex, sexual preference/orientation, marital status, national origin or ancestry, disability, veteran status, genetic information or any other legally protected status.

In carrying out its commitment to equal employment opportunity, Hillman will make reasonable accommodation for applicants and employees with known disabilities who can perform the essential functions of the job with or without such accommodations, unless such accommodation would pose an undue hardship. As a result, applicants and employees requiring any reasonable accommodations should contact their HR Representative.

Employees who have questions or concerns about any type of discrimination in the workplace are encouraged to consult their supervisor, department head, facility manager, HR Representative, or an Executive Officer. You can also call the Ethics Hotline at 1-800-826-6762. Employees can raise concerns and make reports without fear of reprisal. Hillman will investigate all complaints and if a violation of this policy is found, take appropriate action, up to and including termination of employment.

Career Management/Employment Opportunities

Hillman recognizes the benefit of developmental experiences and encourages employees to talk with their supervisor about their career plans. Job openings will normally be posted with the

intention of publicizing and encouraging career development opportunities. In general, notices of regular, full-time job openings will be posted, although Hillman reserves its discretionary right to not post a particular position. (These postings may appear internally on Employee Self-Service, the Hillman website, and the Intranet.) Other recruiting sources may also be used to fill open positions.

Regular job openings below the director level will normally be posted by the Human Resources Department for seven days. To be eligible to apply for a posted position, non-Operations employees must have performed competently and be in their current the position for 12 months. Employees working in Operations must have performed competently and be in their current position for 3 months. They may be granted authorization by their current supervisor to apply for a position. The decision will be based on individual circumstances. Employees who have a written warning or more serious counseling on file dated within the last three months for any infraction of Company policies, including attendance policies, are not eligible to apply for posted jobs.

To apply for a posted position, employees must complete a profile and application on the e-Recruiting system. Certain positions may require a resume. Employees must obtain approval from current manager as defined on the job posting. Please read all postings carefully. The required documents must be completed in their entirety before applicants will be considered. Employees who receive a written warning or more serious discipline at any time during the job posting process will become ineligible for consideration.

Code of Business Conduct and Ethics

Hillman is dedicated to conducting business in a legal, ethical, and honest manner. To achieve this goal, Hillman has created a Code of Business Conduct and Ethics Policy. The Policy addresses the following topics: Accuracy of Public Communications, Accuracy and Integrity of Books and Records, Ethics and Compliance in the International Community, Avoidance of Conflicts of Interest, Governmental Payments, Corporate Opportunities, Confidential and Inside Information, Securities Trading, Fair Dealing, Protection and Proper Use of Hillman's Assets, Equal Employment Opportunity Laws and Diversity, Competition Laws, Health and Safety Laws, Environmental Laws, Money Laundering, Compliance Reporting, Customer Private Identifying Information, Employee Personal Identifying Information, and Prohibition Against Retaliation.

All employees are required to read and become familiar with and abide by the Policy provisions. All exempt employees are required to sign a Potential Conflict of Interest Statement. Employees who have questions should contact their supervisor or the corporate Human Resources Department. Violations of Hillman's Code of Business Conduct and Ethics Policy may lead to disciplinary action, up to and including termination of employment.

Trade Secrets, Inventions, Ideas, Processes and Designs

From time to time, you may participate in the planning or development of certain trade secrets, concepts, or inventions that are meant to assist Hillman's ability to gain a competitive advantage in the marketplace. You may also be exposed to certain trade secrets, unique data, concepts, ideas or information during the course of your employment. Hillman has a strong desire to protect these concepts and ideas.

All trade secrets, inventions, ideas, processes, programs, software and designs (including all improvements) made by Hillman or its employees during the course of employment (whether or not actually conceived during regular business hours) and any work related to our business must be immediately disclosed in writing to us. Hillman will evaluate and determine if the

idea, invention, or design is Company property.

Access to Employee Information

Records Keeping Requirements

It is the responsibility of each employee to promptly notify Human Resources via self-service of any changes in personal data. Other such information should be accurate and current at all times. It is also important to update benefits records, including beneficiary designations. Some examples of such changes include but are not limited to:

- Change of address
- Entering beneficiary information
- Entering dependent information
- Emergency contacts
- Direct deposit information
- Change of marital status
- Birth or adoption of a child
- Updating your email address (This should be your Hillman Group email address if you have one, or your personal email address where you want to receive Hillman related information.)

Accessing Employee Records

Our self-service portal is a single online application used to view and manage employment information, including pay stubs, direct deposit, tax withholding information (W-4), W-2 annual statements, etc. You will have 24/7 online access to this information via a secure internet portal and/a mobile app. After a simple, one-time registration process, you will have the ability to quickly and securely maintain personal information at your convenience. Self-service is available to separated (terminated) employees as well.

Any request for employee record duplicates must be made in writing to your HR Representative in advance of date required. Once terminated, employees cannot have access to their employment file, or they can be accessed electronically as indicated below:

- The Dayforce Self-Service mobile app is available in the Google Play Store and the Apple App Store.
- Employees will need their employee ID and password to log into the Hillman self-service portal (www.dayforcehcm.com).

Employment Verifications, Reference Letters, Reference Checks

Employees should direct verifications of employment to Vault Verify. The company can be reached at www.vaultverify.com. Hillman's Company Code: 24438.

Legal inquires (including subpoenas, interrogatories or other request for information or request) should be directed to the General Counsel and Secretary.

In order to maintain a consistent policy throughout the organization concerning the release of information, all calls to verify employment should be referred to Vault Verify.

Telephone Requests

HR will release only the following information by telephone: 1) whether an individual is currently employed 2) current or last job title and 3) dates of employment. Salary information must be requested in writing and accompanied by a signed authorization from the employee or former employee.

Occasionally, there are requests for personal information (home address, telephone number, birth date, etc.) this information will not be released to external entities.

Written Requests

Written requests for information will be completed provided there is a signature of the employee or former employee authorizing release of the information. The only information released is 1) whether an individual is currently employed 2) current or last job title 3) dates of employment and 4) annual salary.

Employment Relationship

New Hires

A probationary period of 90 days will be implemented for each new hire. Employee performance will be assessed at the end of the 90-day probationary period, and a decision will be made whether to continue the employee's employment with Hillman.

Completion of the introductory period does not alter the employment at-will status or otherwise entitle you to remain employed by Hillman for any definite period of time.

Employment Classification

The Hillman Group Inc. complies with all federal and state regulations pertaining to employment status and benefits. For details about employment status and overtime rules refer to department of labor FLSA guidelines. For details about benefit eligibility refer to page 22. Please note: a temporary change in hours, whether scheduled or un-scheduled, does not imply a change to an employee's classification.

Regular Full-Time Employees – Employees who are not in a temporary status and are regularly scheduled to work Hillman's Full-Time schedule (40 hours per week).

Regular Part-Time Employees – Employees who are not in a temporary status and are regularly scheduled to work less than 30 hours per week.

Temporary Employees (this does NOT include individuals employed by an employment agency or independent contractors) – Temporary employees are defined as employees who are hired as interim replacements, co-ops or summer help to temporarily supplement the workforce or assist in the completion of a specific project. Employment assignments in these categories are of a limited duration. Employment beyond any initially stated period does not

in any way imply a change in employment status. Temporary employees retain that status unless or until they are notified of a change in employment status. Such change must be pre-approved by the Human Resources Department.

Flex Employees – Employees who work less than 30 hours per week, often on an as needed basis.

In addition, employees are classified as either exempt or nonexempt from overtime:

Exempt Employees – Salaried employees performing work of an executive, professional, outside sales, or administrative nature. Exempt employees are exempt from the overtime pay requirement of the Fair Labor Standards Act. Classification as an exempt employee is based solely on government regulations and requires the approval of the Director of Human Resources.

Nonexempt Employees – In accordance with the Fair Labor Standards Act, employees classified as non-exempt are eligible to be paid overtime in accordance with Hillman's Overtime Policy and applicable laws.

Misclassification – Employees who believe that they have been misclassified per the FLSA guidelines, should immediately contact their direct supervisor or the Human Resources Department. The Total Rewards Leader or other representative of the Human Resources Department will promptly investigate all claims of misclassification. If it is determined that an improper classification has occurred, Hillman will promptly take appropriate corrective action as to any necessary reclassification and as to any necessary pay adjustment. *General Note: Assignment to any status or classification does not guarantee employment for any specific period of time. Accordingly, the right to terminate the employment relationship at will at any time is retained by both the employee and Hillman.*

Timekeeping

Federal and state laws and regulations require employers to maintain accurate records of time worked by non-exempt employees. In addition, timely and accurate records ensure timely and accurate wage payments.

Non-exempt employees have the responsibility for accurate and timely entry and submission of all time worked (including overtime and paid/unpaid time off) in the timekeeping system. In addition, managers have the responsibility for reviewing and approving all time submitted by these employees. Managers who fail to review and approve submitted time before the applicable deadline or fail to review/approve time at all may be subject to disciplinary action.

Misrepresentations violate this policy and the Code of Conduct and Business Ethics. Any employee who knowingly misrepresents or falsifies documentation about their time worked will be subject to disciplinary action, up to and including termination from employment.

The official workweek for employee payroll begins at midnight on Sunday and ends at 11:59 p.m. Saturday. Each department determines the work schedule and hours for employees as necessary for its operation. Full-time employees work at least 40 hours per week. However, work schedules may vary among departments including differing full-time, part-time, and overtime required to accommodate the operational needs of the department. Employees are expected to work their

regular schedule based on standard hours. Adjustments to the assigned schedule cannot be made without prior approval of the supervisor.

Break and Meal Periods

Scheduled Breaks: Generally, most work areas allow for an appropriate amount of break time within the workday. Supervisors should identify the standards for breaks in their area and communicate to employees working the position. Breaks are to be utilized consistently for all employees. Unapproved, extended breaks will be addressed by the Attendance Policy.

Except where applicable state law governs, paid break guidelines are as follows:

1. Supervisors reserve the right to change rest break period time or deny rest break periods to ensure departmental needs are being met.
2. An employee is not permitted to accumulate unused rest breaks, nor may the rest break be used to cover an employee's late arrival or early departure from work.
3. Employees on a break should not leave premises. If employees leave, they must notify their supervisor and clock out and back in once they return. Additionally, the break is no longer paid.

Meal Period: Full-time employees are required to take an uninterrupted meal break of at least 30 minutes away from the work area. However, schedules for meal breaks are based upon the operational needs of the work area. Generally, a meal break is unpaid time for which an employee is relieved from work for a period of time.

Overtime

Eligibility for Overtime

In accordance with the Federal Labor Standards Act (FLSA), nonexempt employees are eligible to receive overtime pay at a rate of one and one-half times their regular pay for time worked in excess of 40 hours per workweek or in excess of 8 hours a day where state mandated.

Exempt employees are not eligible for overtime; they are expected to work as many hours as required to perform the duties of the position.

Scheduling and Working Overtime

Before overtime is worked, an employee must have approval from his or her supervisor. Overtime is considered a condition of employment, and refusal to accept it when reasonable notice has been given is cause for discipline, up to and including termination. At the supervisor's discretion, an employee's work schedule may be adjusted during a workweek to avoid overtime.

Time Worked

For nonexempt employees in the Distribution and Packaging Centers, holiday leave is paid at an employee's regular rate of pay, and are counted as time worked for the purposes of computing overtime. Vacation, voting time, Family and Medical Leave Act (FMLA), military, bereavement and sick leave is paid at an employee's regular rate of pay but does not count as time worked.

For all other nonexempt employees, including PPS nonexempt employees, approved paid absences, including vacation leave, holiday leave, Family and Medical Leave Act (FMLA) leave, military leave, funeral/bereavement leave and jury and witness duty and voting time off are paid at an employee's regular rate of pay, and are not counted as time worked for the purposes of computing overtime. Sick leave also does not count as time worked.

Paydays

Hillman paydays are scheduled bi-weekly, on every other Friday, for two previous work weeks. In the event a national bank holiday falls on a payday, payments will be issued the preceding workday.

Personal Relationships in the Workplace

The employment of relatives or those in a personal relationship can cause, or create the perception of causing, serious conflicts and problems with favoritism and employee morale. In these circumstances, both the employee and the supervisor leave themselves open to charges of inequitable consideration in all decisions concerning their work. In addition to claims of partiality in treatment at work, personal conflicts from outside the work environment can be carried into day-to-day working relationships.

This policy applies to individuals who are related to or have a personal relationship with another employee. A relative is defined as those related by blood, adoption, or marriage or as a result of other legal processes. A "personal relationship" is defined as a relationship between individuals who have or have had a continuing relationship of a romantic or intimate nature.

Although Hillman has no strict prohibition against employing relatives of current employees or individuals involved in a personal relationship with current employees, we are committed to monitoring situations in which such relationships exist. Generally, relatives or those involved in a personal relationship should not be hired or promoted into a position where they supervise one another. The CHRO must approve any exceptions to this policy.

When a conflict arises because of a personal relationship between employees, even if there is no line of authority or reporting involved, the company will take prompt action, where the employees may be separated by reassignment, or terminated from employment.

Employment Termination

While we would hope for a mutually beneficial employment relationship, terminations, both voluntary and involuntary, are inevitable. We are an "at will" employer and recognize that employment is terminable at the discretion of either the employee or Hillman.

An involuntary termination of employment is a management-initiated dismissal with or without cause.

The inability of an employee to perform the essential functions of his or her job with or without a reasonable accommodation may also result in an involuntary termination. An employee may also be discharged for any legal reason, including but not limited to: misconduct, tardiness, absenteeism, unsatisfactory performance or inability to perform.

Employees who voluntarily resign are expected to give Hillman a minimum of two weeks' notice in writing. In professional positions, a longer period of notice may be appropriate and expected.

Return of Company Property

Employees are responsible for all Hillman property, materials, and written information in their possession or control. Employees must return all Hillman property immediately upon request or upon termination of employment. Where permitted by applicable laws, Hillman may withhold from the employee's paycheck the cost of any items that are not returned when required. Hillman may also take all action deemed appropriate to recover or protect its property.

Exit Interview

Hillman will endeavor to conduct exit interviews with all terminating employees, whenever practical. The exit interview will include information about benefits continuation and a review of any relevant post-employment requirements, such as confidentiality and non-compete obligations.

Final Paycheck

Terminating employees will receive their final paycheck on the next regularly scheduled pay date unless otherwise dictated by state law. The final paycheck(s) will include payment of all earned and unused vacation as of the last day worked. The Human Resources Department will mail the final paychecks to the employee's last known address or via direct deposit per normal payroll schedule. Separated employees will continue to have access to payroll information, including a W-2 link on the Employee Self-Service system.

Compensation and Benefits

Compensation System

Hillman maintains a compensation and performance management system to provide a systematic and consistent approach to one's performance and compensation.

Compensation

Attracting, retaining and engaging talented employees is critical to Hillman's success. The Company is committed to paying competitive wages that reflect the responsibilities and requirements of each position. The Compensation Department determines each position's pay grade by reviewing a written job description, reviewing salary survey data, and comparing the position to others within the Company.

Performance Evaluation

Hillman strongly supports and encourages on-going discussions between managers and staff members regarding expectations and performance. Company-wide performance appraisals are conducted annually to provide supervisors and employees the opportunity to set objectives, discuss job tasks, identify and correct weaknesses, recognize strengths, and discuss purposeful approaches to meeting goals. The performance of all sales and non-exempt employees is generally evaluated on an ongoing 12-month cycle, usually occurring during the first quarter of the calendar year. Exempt employees are also generally evaluated on an ongoing 12-month cycle, usually occurring during the 1st quarter of the calendar year.

Pay Adjustments

Hillman is a pay-for-performance employer, and may adjust employee base pay for the following reasons:

- Merit-based in conjunction with the annual performance appraisal process to recognize performance
- Promotion or demotion
- Lateral transfer to different job inside or outside of current department
- Job market pricing/organizational compensation analysis

Favorable performance evaluations do not guarantee increases in salary or promotions. Pay adjustments and promotions are solely within the discretion of Hillman and depend upon many factors in addition to performance.

Supervisors must contact their Human Resources Business Partner and the Compensation Team to review all proposed pay adjustments and obtain approval before communicating with employees.

Pay Deductions

The law requires that Hillman make certain deductions from every employee's compensation such as applicable federal, state, and local income taxes. Hillman must also deduct Social Security taxes up to a specified limit, called the Social Security "wage base." Hillman matches the amount of Social Security taxes paid by each employee.

In addition, Hillman offers voluntary benefit programs that involve an employee contribution. Eligible employees may authorize deductions from their paycheck to cover the costs of participation in these programs.

Pay deductions may also be taken by Hillman to pay an obligation to Hillman or others, e.g., garnishments, child support, etc. Hillman is required by law to comply with court-ordered payments and will notify employees when they initiate a deduction.

Administrative Pay Corrections

Hillman takes all reasonable steps to ensure that employees are paid promptly on the scheduled payday and receive the correct amount of pay in each paycheck. In the unlikely event that there is an error in the amount of pay, employees shall promptly notify their supervisor so that a correction can be made as quickly as possible. If the error is Hillman's, the correction will be made as soon as possible. If the error is due to the employee not entering the correct information or clocking in or out, the pay will be corrected in the next pay period.

Improper Deductions – Employees who believe that an improper deduction has been made to their salary shall immediately contact their direct supervisor. The payroll team or other representative of the Human Resources Department will promptly investigate all claims of improper deductions. If it is determined that an improper deduction has occurred, Hillman will promptly reimburse the employee for the appropriate pay, usually in the next available payroll run.

Holidays

Hillman will grant holiday time off to eligible employees on the following holidays:

New Year's Day
Memorial Day
Independence Day
Labor Day
Thanksgiving
Day after Thanksgiving
Christmas Eve, and
Christmas Day
Two floating holidays*

Only regular, full-time employees are eligible to receive holiday pay.

Regular, full-time employees will be eligible to receive holiday pay at a rate of 8-hours per holiday. Non-exempt employees who work on a recognized holiday will receive holiday pay plus wages at their base pay rate for the hours worked on the holiday.

*Employees hired in the first half of the year (prior to July 1) will receive one floating holiday that they can take at during the 2nd half of the year. Those employees hired after July 1 will receive both floating holidays at the beginning of their 2nd calendar year of employment. Floating holidays may be scheduled on any workday but must be scheduled and pre-approved by their supervisor. The floating holiday is not an accrued benefit, and thus, an "unused holiday" benefit will not be paid upon termination of employment unless required by state law. In addition, employees may not carry over any "unused holidays" to the following calendar year.

A recognized holiday that falls on a Saturday will generally be observed on the preceding Friday. A recognized holiday that falls on a Sunday will generally be observed on the following Monday.

To be eligible for **holiday pay**, regardless of the day on which the holiday falls, nonexempt employees must be present and work their regularly scheduled workday immediately before and after the holiday. The definition of a regularly scheduled workday is any day which is the last day an employee is scheduled to work before or after a holiday, including mandatory overtime. If an employee has a pre-approved vacation day or floating holiday the day before or after the holiday, the day will be counted as "worked" and the employee will receive holiday pay. Pre-approved vacation days or floating holidays may be taken during the days immediately preceding and following an observed holiday; however, please keep in mind that paid (or unpaid) personal time may never be substituted for regularly scheduled workdays. Vacation pay also may not be substituted if an employee calls in sick on any scheduled workday.

In addition, if a recognized holiday occurs when an eligible employee is on any type of leave, the employee is not considered eligible for holiday pay.

Note: The holiday schedule for All Points employees may vary from year-to-year due to the unique nature of the business. The All Points holiday schedule will be posted annually in that facility.

Vacation Benefits

Vacation time off with pay is available to eligible employees to provide opportunities for rest, relaxation, and personal pursuits. Employees are encouraged to use their earned vacation days each calendar year. Only regular, full time employees are eligible to earn and use paid vacation time.

Exempt Vacation Schedule

Years of Service	Number of Vacation Hours	Hours Accrued per Pay Period
0 – 15 years	120	4.62 hours
15+ years	160	6.15 hours

This schedule applies to all exempt employees except those at CCS corporate office and the leadership team. CCS and the leadership team can access their vacation policy by [clicking here](#).

- Exempt Employees must take vacation in full or half day increments
- Increase to vacation days happens on hire date anniversary and prorated for the year.

Nonexempt Vacation Schedule

Years of Service	Number of Vacation Hours	Hours Accrued per Pay Period
0 – 5 years	80	3.08 hours
5 – 15 years	120	4.62 hours
15+ years	160	6.15 hours

- New employees must complete 30 days of service before they are eligible to use vacation benefits.
- Non-exempt employees may take vacation in one-hour increments. Vacation is use it or lose it in year it is earned, unless otherwise required by state law.
- The number of vacation days a person receives changes on the anniversary of their hire date and prorated for the year.

All employees (Service, Sales, Hourly and Salary) must submit vacation requests via the employee self-service system (Dayforce). Employees must request vacation in advance and obtain their supervisor's approval. Efforts will be made to accommodate vacation requests whenever possible, but the requirements of the business must be considered when vacation requests are reviewed.

Vacation benefits are paid at the employee's base rate of pay and will not include overtime or other special forms of compensation, such as shift differentials, incentives or bonuses. The need for sick time off during a scheduled vacation period will be charged as vacation, not sick time. Employees will receive holiday pay for Company recognized holidays that fall within a scheduled vacation, and vacation benefits will not be charged for that holiday.

Maximum Vacation Accrual and Payout Upon Termination

Employees are encouraged to plan their work schedule so that earned vacation days are taken each year.

Upon termination of employment for any reason, employees will only be paid (at employee's base rate of pay) for unused vacation accrued in the calendar year of termination unless otherwise required by state law.

Employees who separate from employment and are rehired after more than a 90-day break in service return as new employees under the provisions of this policy.

Advancing Vacation

With the supervisor's written approval, a nonexempt employee who has more than 30 days of service may be advanced vacation against future vacation accrual to be earned in the current calendar year. An exempt employee who has more than 30 days of service may be advanced vacation days against future vacation accrual to be earned in the current calendar year. If an employee terminates employment before earning the vacation that has been advanced, the Company will deduct the used, unearned vacation time from the employee's final paycheck, subject to applicable state law.

Vacation Buy-Up

All exempt and nonexempt employees are eligible to purchase up to an additional 40 hours of vacation during open enrollment. Please see the Vacation Buy-Up policy for more details.

Paid Sick Time Benefits

Although attendance is extremely important, Hillman recognizes that employees do get sick and face emergency situations that might prohibit them from coming to work. Therefore, employees in the following employment classification are eligible to earn and use paid sick time:

* Regular full and part time non-exempt employees

Sick Hours	Hours Accrued Per Pay Period
40	1.54

Up to 40 hours of sick time not used will be paid out in January of following year, but not upon termination unless there is a state requirement. If accrued balance is negative, we will recapture in last paycheck. The number of sick days may be higher for nonexempt employees located in states or municipalities where it is required by law.

Eligible, non-exempt employees will receive 40 hours of sick time January 1 of each year. Nonexempt employees hired during the year will receive a prorated amount based on month hired. Unused sick time for the year, will be paid out in January of the following year. Employees must work for 30 days before sick time can be used. Part-time employees will receive a prorated amount based on the number of hours they are scheduled to work.

Employees can request paid sick time 30 calendar days after they became eligible to accrue paid sick time. Paid sick time can be used in any increments. Paid sick time will be calculated based on the employee's base pay rate at the time of absence and will not include any special forms of compensation, such as incentives or bonuses.

When employees are absent for three or more consecutive days due to illness or injury, a physician's statement may be requested to verify the condition and expected return to work date. Such verification may also be requested for other sick absences. Before returning to work from a sick absence of three consecutive days or more, employees may be required to provide a physician's verification that they may safely return to work. Please refer to the Attendance Policy for more information.

Bereavement Pay

In the event of the death of an immediate family member, regular, full-time employees may be paid bereavement leave.

Employees may be paid three (3) days (they do not need to be used all at the same time) for each death of an immediate family member. Immediate family is defined as: spouse, parents, in-laws, legal guardian, children (biological, step or adopted), sister, brother, sister-in-law, brother-in-law, grandparents and grandchildren.

Employees must immediately notify their supervisor of the need for bereavement time off. Hillman may require proof of death, funeral attendance, and/or relationship to the deceased person and may suspend payment of bereavement time until such proof is provided.

Bereavement pay will be calculated on the employee's base rate times the number of regularly scheduled hours the employee would have worked on the day of absence (excluding overtime). Bereavement pay will not include any special forms of compensation, such as shift differentials, incentives or bonuses. If a family death occurs during an employee's scheduled vacation, the time off that would be eligible for bereavement leave will be charged as bereavement leave instead of vacation.

Employees may, with their supervisor's approval, use any available paid or unpaid leave for additional time off, as necessary. Such additional leave will normally be granted unless business needs or staffing requirements require otherwise.

Employees who falsify information in order to receive bereavement pay will be subject to disciplinary action, up to and including termination of employment.

Jury Duty

Hillman encourages employees to fulfill their civic responsibilities by serving jury duty when required. Regular, full-time employees are eligible to request up to 80 hours of paid jury duty leave over any 12-month period.

To request time off for jury duty, employees must show the jury duty summons to their supervisor as soon as possible. Either Hillman or an employee may request an excuse from jury duty if, in Hillman's judgment, the employee's absence would create serious operational difficulties.

Employees on jury duty are expected to report for work whenever the court schedule permits. Employees must bring in an excused form for the days they have to report for jury duty. If an employee does not have an excused form from the court, they can use a vacation day or be subject to discipline per the Attendance Policy. Jury duty pay will be calculated on the employee's base rate times the number of regularly scheduled hours the employee would have worked on the day of absence (excluding overtime). Jury duty pay will not include any special forms of compensation, such as shift differentials, incentives or bonuses. Hillman will not compensate employees who serve jury duty on a day that is not their regularly scheduled workday.

Hillman will continue to provide elected benefits for the full term of the jury duty absence provided the employee makes the required contribution at the active employee contribution rate. Vacation, paid personal time (sick time), and holiday benefits will continue to accrue during any unpaid jury leave.

Employees subpoenaed to appear in court are required to use either vacation or sick time for time missed, subject to state law requirements.

Voting

Hillman encourages employees to fulfill their civic responsibilities by participating in elections. Generally, employees can find time to vote either before or after their regular work schedule. If employees are unable to vote in an election during their non-working hours, Hillman will grant time off to vote as required by state law. Employees must request time off to vote from their supervisor at least two (2) working days prior to the Election Day. Advance notice is required so that the necessary time off can be scheduled at the beginning or end of the work shift; whichever provides the least disruption to the normal work schedule.

Benefits Continuation (COBRA)

The federal Consolidated Omnibus Budget Reconciliation Act (COBRA) gives certain employees and dependents who would otherwise cease to be covered the opportunity to continue health insurance coverage under Hillman's health plan for a specified transitional period.

The employee or beneficiary pays the full cost of coverage plus an administrative fee under COBRA. Eligible employees are provided with a written notice describing the rights granted under COBRA when the employee becomes eligible to participate in Hillman's health insurance plan. The notice contains important information about the employee's rights and obligations.

Educational Assistance

Hillman recognizes that the skills and knowledge of its employees are critical to the success of the organization. The education assistance program encourages personal development through formal education. Hillman offers education assistance to eligible regular, full-time employees who have completed one year of service as a regular full-time employee. Please see the Educational Assistance Policy for more information.

Leaves of Absence

Family Medical Leave Act

Basic Leave Entitlement

It is the policy of Hillman to comply with the requirements of all State and Federal laws, including the Family Medical Leave Act (FMLA), which entitles employees to take time away from work for the following reasons:

- The employee's own "serious health condition" that makes the employee unable to perform the functions of his or her position;
- The birth or care of a newborn (must be within the 12-month period following the child's birth);
- The placement of a child through adoption or foster care (expires at the end of the 12-month period beginning with placement); or
- In order to care for the spouse, or a son, daughter, or parent, of the employee, if such spouse, son, daughter, or parent has a serious health condition.

Entitlement – Military Family Leave Entitlement

- Eligible employees may use their 12-week FMLA entitlement for "any qualifying exigency" arising out of the fact that the spouse, son, daughter, or parent of the employee is on active military duty, or has been notified of an impending call to active military duty status, in support of a contingency operation, for reasons related to or affected by the family member's call-up or service. The qualifying exigency must be one of the following: (1) short-notice deployment; (2) military events and activities; (3) child care and school activities; (4) financial and legal arrangements; (5) counseling; (6) rest and recuperation; (7) post-deployment activities; and (8) additional activities that arise out of active duty, provided that Hillman and the employee agree, including agreement on timing and duration of leave. This requires the Secretary of Labor to define the qualifying exigency.
- An eligible employee who is the spouse, son, daughter, parent or next of kin of a covered military service member who is undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status, or is otherwise on the temporary disability retired list as a result of a serious injury or illness; or a veteran who is undergoing medical illness and who was a member of the Armed Forces (including a member of the National Guard or Reserves) at any time during the period of 5 years preceding the date on which the veteran undergoes that medical treatment, recuperation, or therapy ("Covered Service Member"), is entitled to up to 26 weeks of leave in a single 12-month period to care for the service member.

Definitions

Eligible Employee – an employee who has been employed for at least 12 months by the employer with respect to whom leave is requested under section 102 of the Act; and for at least 1,250 hours of service with such employer during the previous 12-month period.

Exclusions – The term "eligible employee" does not include any Federal officer or employee covered under subchapter V of chapter 63 title 5, United State Code; or any employee of any employer who is employed at a worksite at which such employer employs less than 50 employees if the total number of employees employed by that employer within 75 miles of that worksite is less than 50.

Determination – For purposes of determining whether an employee meets the hours of service requirement specified in subparagraph, the legal standards for calculating hours worked under the Fair Labor Standards Act shall apply. This paid and unpaid time off, such as vacation, PTO, and other leaves, do not count as hours worked.

Immediate Family Member – a spouse, child, or parent (but not a parent-in-law).

Key Employee – a salaried eligible employee who is among the highest paid ten percent of employees within 75 miles of the worksite.

Parent – biological parent of an employee or an individual who stood in loco parentis to an employee when the employee was a son or daughter.

Reduced Leave Schedule – a leave schedule that reduces the usual number of hours per workweek, or hours per workday, of an employee.

Serious Health Condition – an illness, injury, impairment, or physical or mental condition that involves:

- Any period of incapacity or treatment connected with inpatient care (i.e., an overnight stay) in a hospital, hospice or residential medical care facility;

- A period of incapacity requiring absence of more than **three calendar days** from work, school, or other regular daily activities that also involves treatment 2 or more times by a health care provider, nurse, or physician's assistant under direct supervision of a health care provider, or by a provider of health care services (e.g., physical therapist) under orders of, or on referral by, a health care provider; or treatment by a health care provider on at least one (1) occasion which results in a regimen of continuing treatment under the supervision of the health care provider;
- Any period of incapacity due to pregnancy (e.g. a complication of pregnancy requiring total bed rest), or for prenatal care;
- Any period of incapacity (or treatment therefore) due to a chronic serious health condition (e.g., asthma, diabetes, epilepsy, etc.);
- A period of incapacity that is permanent or long-term due to a condition for which treatment may not be effective (e.g., Alzheimer's, stroke, terminal diseases, etc.); or
- Any absences to receive multiple treatments (including any period of recovery from such treatment) by, or on referral by, a "health care provider" for a condition that likely would result in incapacity of more than three consecutive days if left untreated (e.g., cancer (chemotherapy), severe arthritis (physical therapy), kidney disease (dialysis), etc.).

Son or Daughter – a biological, adopted, or foster child, a stepchild, a legal ward, or a child of a person standing in loco parentis, who is – under the age of 18 years; or 18 years of age or older and incapable of self-care because of a mental or physical disability.

Spouse – a husband or wife, including a same-sex spouse.

12-Month Period – a rolling 12-month period measured backward from the date the leave is taken and continuous with each additional leave day (or portion thereof) taken.

Covered Active Duty – (1) in the case of a member of a regular component of the Armed Forces, duty during the deployment of the member with the Armed Forces to a foreign country; and (2) in the case of a member of a reserve component of the Armed Forces, duty during the deployment of the member with the Armed Forces to a foreign country under a call or order to active duty under a provision of law referred to in section 101(a)(13)(B) of title 10, United States Code.

Next of Kin – the nearest blood relative of that individual.

Procedures/Guidelines

Hillman will grant job protected family and medical leave (unpaid except as explained below) for up to 12 weeks per rolling "12-month period" for any of the reasons stated above. If both spouses work for Hillman, the total combined leave time in any "12-month period" will be limited to an aggregate of 12 weeks if the leave is taken for the birth or placement of a child for adoption, or to care for a member of the immediate family with a serious health condition.

In addition, Hillman will grant job protected family and medical leave for up to 26 weeks in a single "12-month period," if the Hillman employee is the spouse, son, daughter, parent or next-of-kin of a covered service member who is recovering from a serious illness or injury sustained in the line of duty. The eligible employee is entitled to a combined total of 26 weeks of all types of FMLA leave; restrictions also apply. USEPRA

Intermittent Leave

The employee may take leave intermittently (i.e., a few days or a few hours at a time) or on a reduced leave schedule if medically necessary to care for an "immediate family member" with a "serious health condition" or because of the "serious health condition" of the employee, or if

necessary to tend to a qualifying exigency that arises as a result of a call to active duty. If you take foreseeable intermittent leave or leave on a reduced schedule, Hillman may require you to transfer temporarily to an available alternative position for which you are qualified that better accommodates recurring leave and has equivalent pay and benefits. **The employee may not take leave intermittently or on a reduced schedule (unless medically necessary due to a "serious health condition" of the child) for birth or placement for adoption or to provide foster care for a child. If you are approved for intermittent leave, you are not relieved of the requirement to advise your supervisor that you will be absent each and every time you are absent.**

Employees who need intermittent or reduced schedule leave for foreseeable medical treatment must work with their supervisor to schedule the leave so as not to unduly disrupt operations, subject to the approval of the employee's health care provider. In such cases, management may transfer the employee temporarily to an alternative job with equivalent pay and benefits that accommodate recurring periods of leave better than the employee's regular job.

Substitution Paid Leave

To the extent permitted by law, an employee on FMLA leave will be required to use all accrued paid sick time, vacation, or any other paid leave to which the employee is entitled while taking FMLA leave. FMLA leave for salaried employees that is not due to a serious health condition of the employee will be without pay following five (5) days of such leave. The five (5) days need not be consecutive nor do they need to be for the same qualifying reason without pay following five (5) days of such leave. In addition, the employee must exhaust all available paid vacation time, except for vacation time purchased. When an employee has used all accrued paid personal, vacation time and other paid leave for a portion of FMLA leave, all remaining FMLA leave will be unpaid. In other words, the vacation and/or paid personal time run concurrently with the FMLA leave; they may not be used back to back.

Employees receiving any form of compensation under Hillman's Short-Term Disability policy or Worker's Compensation will be considered to be on FMLA leave if the reason for leave qualifies for FMLA leave. If the reason for leave qualifies for FMLA leave, the FMLA leave will run concurrent with the short-term disability or period of disability under Workers' Compensation. The elimination period, if any, will also be counted as FMLA leave. Similarly, if the reason for leave qualifies under any state or local leave law, the absence will be simultaneously counted towards both the FMLA and the applicable state or local leave law entitlement. Employees cannot use vacation time to supplement Short-Term disability payments.

Holidays occurring during an unpaid portion of FMLA leave will not be paid.

Benefits During Leave

If you take FMLA leave, you will not lose employment benefits that accrued before the date leave began. While you are on leave, Hillman will pay, on your behalf, the costs of any benefits from group coverage paid by a group premium (e.g., disability insurance). Subject to the terms, conditions and limitations of the applicable plans, Hillman will continue to **provide** its portion, if any, of health insurance benefits for the full period of the approved FMLA leave unless, during the leave period, the employment relationship would have terminated if the employee had not taken FMLA leave. **If you are delinquent in paying your share of benefit premiums and your delinquency continues for fifteen (15) days after Hillman gives you notice of your delinquency, then your benefits will be canceled. Hillman does not guarantee insurance coverage or payment of insurance benefits. You will have the option to continue any other available benefits at your own expense.**

If you fail to return to work because of the continuation, recurrence or onset of a serious health condition of you, or your spouse, child, or parent, or the recurrence or onset of need to care for a Covered Service Member, then you must provide Hillman with medical certification of you or your family member's serious health condition, or in the case of a Covered Service Member, the member's serious illness or injury, within thirty (30) days from the date you notify Hillman that you will not return to work. If you do not provide the medical certification in a timely manner, then Hillman can recover the portion of health care premiums paid by Hillman on your behalf as set forth above.

Benefit accruals, such as vacation or paid personal time, will not be suspended during the first 12 weeks of the leave. Salary adjustments will not become effective until the employee returns to active employment.

Employee Notice Objections

The employee is responsible for notifying his or her supervisor that a leave will be required. The employee must provide Hillman with at least thirty (30) days advance notice when the need is foreseeable. If the employee is unable to give such notice because the need for leave is not foreseeable, then the employee must give as much notice as practicable, which ordinarily means the same day or next business day of when the need for leave becomes known to the associate, and in accordance with normal attendance and call-in procedures. The employee must either mention FMLA when requesting such leave or provide sufficient information for the supervisor to understand that the employee needs leave for FMLA qualifying reasons (including when an employee has been approved for intermittent leave and is calling in due to a flare-up). Failure to timely notify the Company that FMLA leave is needed may result in the denial or delay of FMLA leave. Failure to follow normal call-in procedures may result in discipline under the attendance policy, even if FMLA might otherwise apply to the reason for leave. In all cases, the supervisor must notify Human Resources immediately upon receiving a request that a leave be counted as FMLA leave, even if the supervisor feels that timely notice was not given.

Medical Certification

The employee seeking to use FMLA leave will be required to provide:

1. Medical certification supporting the need for leave that is due to a serious health condition affecting the employee or an "immediate family member" (certification must be submitted **within 15 calendar days** of the request for the leave);
2. The dates the requested leave is to begin and end, or the specific dates or estimated frequency and duration for intermittent FMLA leave;
3. Periodic re-certifications during the leave including medical certification supporting the need for continued leave;
4. Periodic reports during the FMLA leave regarding the employee's status and intent to return to work; and
5. "Return to Work" notice from his or her physician before returning to work if the employee was on FMLA leave as a result of a personal injury or illness.
6. A complete and sufficient certification to support a request for FMLA leave due to a qualifying exigency includes written documentation confirming a covered military member's active duty or call to active duty status in support of a contingency operation. One of the following would be considered sufficient: a copy of the covered military member's active duty order, other documentation from the military certifying that the covered military member is on active duty (or has been notified of an impending call to active duty) in support of a contingency operation or have previously provided the employer with sufficient written documentation confirming the covered military member's active duty or call to active duty status in support of a contingency operation.

Hillman may require second or third medical opinions (at Hillman's expense).

Employer Notices

Human Resources is responsible for ensuring that the employee is provided with the appropriate forms to be completed, and the FMLA letter of approval or denial. If the leave is denied, the letter will include the reason for the denial.

Return from FMLA Leave

The employee is expected to return immediately following the earliest of: the date upon which the anticipated duration of the FMLA leave expires, or the date upon which the need for the leave ceases, or the end of the twelve (12) week maximum time period permitted for FMLA leave unless a continued leave of absence has been approved under Hillman's medical leave policy. Otherwise, failure to return to work immediately following the leave expiration date will be considered a voluntary resignation. The employee must provide written notification of any changes in the anticipated duration of the leave and return to work date, or his or her intention to return or not to return to work.

So that an employee's return to work can be properly scheduled, an employee on FMLA leave is requested to provide Hillman with at least two (2) weeks advanced notice of the date the employee intends to return to work. If circumstances of your leave change and you are able to return to work earlier than the date you previously indicate, then you must notify Hillman at least two (2) work days prior to the date you intend to return.

When a FMLA leave ends, the employee will be reinstated to the same position, if it is available, or to an equivalent position with equivalent pay, benefits and other employment terms and conditions, unless the employee is determined to be a "key employee." If the employee is a key employee, restoration to employment may be denied following FMLA leave on the grounds that such restoration will cause substantial and grievous economic harm to Hillman, in which case, the employee will be notified and given a reasonable opportunity to return to work. Whether an employee is a "key employee" will be determined at the time of the request for leave.

Human Resources is responsible for compliance with this policy and ensuring that all employees approved for FMLA leave are granted time off in a non-discriminatory manner.

Medical Leave of Absence

Employees are eligible to request or be placed on leave an unpaid medical leave of absence (Medical LOA) for a disability. An unpaid Medical LOA may be granted to qualified individuals as a reasonable accommodation for a disability, including where an employee with a disability is not yet eligible for FMLA, or the employee's FMLA entitlement and/or short-term disability benefits have been exhausted. Requests for a Medical LOA will be considered on a case-by-case basis.

Typically, no more than six months of medical leave (inclusive of FMLA, STD, worker's compensation and all other leave) is the maximum period of leave that will be granted. However, all requests for leave, including requests for leave less than and in excess of six months, will be considered on a case-by-case basis in accordance with the ADA and applicable state or local law. The Company is not required to grant any leave request that is unreasonable or would create an undue hardship on the Company.

Requests for an unpaid Medical LOA must be submitted to the immediate supervisor, Lincoln Financial and Human Resources in writing at least 30 days in advance of the leave, or as soon

as the need for leave becomes known to the employee. The employee is required to submit medical documentation Lincoln Financial to support the leave request.

All earned, unused vacation must be taken at the beginning of a Medical LOA, after which all remaining leave will be unpaid. The employee may also apply for LTD benefits, though the decision of whether or not benefits are available is separate from the decision of whether medical leave can be granted as a reasonable accommodation for a disability.

Benefits such as accumulation of vacation and paid sick time will be suspended during a Medical LOA and will resume upon return to active employment. Also, employees will not be eligible for benefits relating to holidays occurring during the approved leave. Subject to the terms, conditions and limitations of the applicable plans, Hillman will generally continue to provide health insurance benefits for the full period of the approved Medical LOA provided the employee makes their portion of the required contributions. Contact Human Resources for more information about benefits during unpaid leave.

If an employee fails to report to work at the end of an approved unpaid Medical LOA without timely requesting and submitting appropriate documentation for additional accommodation for a disability, the Company will assume the employee has voluntarily terminated employment. If at the end of an approved leave the employee is unable to return to work or is released to return to work with restrictions, the Company will engage in the interactive process with the employee to determine whether reasonable accommodation can be provided, such as modified duties, an additional leave of absence, or in some cases, transfer to a vacant position for which the employee is qualified.

If, while on a Medical LOA, an employee seeks employment with another company, or goes into business for himself/herself, the Company may terminate the employee's employment depending upon circumstances.

Personal Leave of Absence

Hillman may provide an unpaid Personal Leave of Absence ("Personal Leave") to eligible employees who are not eligible under another leave policy (such as FMLA) but need to take time off from work for the following situations: to extend a bereavement leave, personal or family crisis, serious medical condition of an immediate family member, or the birth or adoption of a child. To qualify as an approved leave, the leave must last at least one work week and must be arranged and approved (in advance when feasible) by Human Resources. All leaves are subject to the provisions of applicable attendance policies. Employees in the following employment classifications are eligible to request an unpaid leave of absence after 90 days of employment:

- * Regular Full-Time employees
- * Regular Part-Time employees
- * Regular Flex employees

The request for a Personal Leave must be made in writing and/or be accompanied by supporting documentation. With the approval of the Department Manager and Human Resources, an unpaid leave of absence may be granted for up to 30 calendar days during a rolling 12-month period. If the initial period of absence proves insufficient, Hillman will consider a written request for an extension of no more than 30 calendar days. Requests will be evaluated based on a number of factors, including anticipated workload and staffing considerations during the requested absence. All Personal Leaves are granted or denied at the sole discretion of Hillman.

Employees must use any available paid sick or vacation time before Personal Leave will be granted. Subject to the terms, conditions and limitations of the applicable plans, Hillman will generally continue to provide health insurance benefits for the full period of the approved Personal Leave provided the employee makes the required contributions. Benefits such as accumulation of vacation and paid sick time will be suspended during Personal Leave and will resume upon return to active employment. Also, employees will not be eligible for benefits relating to holidays occurring during the approved leave.

When a leave ends, Hillman will make reasonable efforts to return the employee to the same position, if it is available, or to a similar available position for which an employee is qualified. However, Hillman cannot guarantee reinstatement in all cases. If an employee fails to report to work promptly at the expiration of the approved leave period, Hillman will assume the employee has resigned. In the case of a leave for personal illness, employees must present a return-to-work authorization from the attending physician prior to or upon return to work.

If, while on a Personal Leave, an employee seeks employment with another company, or goes into business for himself/herself, the Company may terminate the employee's employment depending upon circumstances.

Military Leave (USERRA)

All employees who are members of or join the United States military, including the Armed Forces, Army National Guard, the Air National Guard, and the commissioned corps of the Public Health Service, shall be granted up to five (5) years of unpaid time off work for training and active duty in accord with the Uniformed Services Employment and Reemployment Rights Act of 1994 (USERRA). Under some circumstances, this 5-year period may be extended as required by USERRA. All regular Full-Time and regular part-time employees are eligible to request a military leave for the purpose of military service, training, or medical examination to determine fitness to enter active duty or initial active duty training.

Employees must provide advance written or verbal notice when military service is required, unless military necessity prevents such notice, or it is otherwise impossible or unreasonable. The leave will be unpaid; however, for up to two weeks per year Hillman will pay the difference between the employee's regularly scheduled base pay and the military pay received for that same time period. Employees may, but are not required to, use any available paid time off for any unpaid portion of the absence.

During the first 30 days of military leave, employees and any covered dependents will continue to receive health insurance benefits provided the employee makes the required contributions at the active employee contribution rate. Employees on military leave for 31 days or more may elect COBRA coverage at the full COBRA premium rate at employee's expense. Upon re-employment employees may be entitled to health insurance benefits, as required by USERRA, based on the length of the leave and subject to the terms, conditions and limitations of the applicable plans for which the employee is otherwise eligible.

During the military leave, life, short-term and long-term disability benefits will be suspended. Upon return, coverage will be reinstated to the level carried prior to the beginning of the leave period (provided eligibility requirements are met). During the period of the unpaid military leave employees may not make 401(k) contributions. However, upon return to work, employees may make up any contributions missed while on leave. Vacation and paid personal time will only accrue during the first 30 days of a military leave of absence.

Employees on military leave for up to 30 days are required to return to work for the first regularly scheduled shift after the end of service, allowing reasonable travel time plus an 8-hour rest period. For service of more than 30 days but less than 181 days, the service member must submit an application for reemployment within 14 days of release from service. For service of more than 180 days, an application for reemployment must be submitted within 90 days of release from service. Employees who return from military leave will be placed in the position they would have attained had they remained continuously employed, or a comparable position, depending on the length of military service, and in accordance with USERRA. Employees will be treated as though they had been continuously employed for purposes of determining benefits based on length of service.

Any violation of terms or conditions under which a leave is granted, failure to return at the expiration of the leave, acceptance of other employment during a leave, performing work for another person or entity (with or without pay) during a leave, attempts to misuse this policy and attempts to use this policy for other than its intended purpose will result in your termination of employment with Hillman.

Work Place Guidelines

Employee Relations

Hillman strives to offer and maintain a positive, productive work environment. If employees have concerns about working conditions, compensation or any other issues, they are strongly encouraged to voice these concerns openly and directly to their supervisor or any level of management. Hillman will demonstrate its commitment to employees by responding effectively to employee concerns.

Hillman has an Open-Door policy for resolving employee problems, questions, and concerns. Employees should always feel free to discuss issues or concerns without fear of retaliation. If supervisors or managers are unable to or uncomfortable responding to a particular issue, employees should be referred to Human Resources so they can address the concern in a fair and equitable manner. Employees should never be made to feel that they have no avenue of recourse in getting issues addressed promptly and accurately. Supervisors should strive to create a strong working relationship with employees based upon an attitude of teamwork that helps accomplish corporate and personal goals. This happens when all avenues of communication open and the uniqueness of every individual in our culturally diverse workforce is valued.

Use of Company Property

All Company workspace and equipment, including file cabinets are the property of Hillman and must be available to management at all times. The use of personal locks on any company property is strictly forbidden. Hillman reserves the right to conduct searches of any person, vehicle or object that enters Company property. Pursuant to this provision, the Company is authorized to search desks, purses, briefcases, baggage, toolboxes, lunch sacks, clothing, vehicles parked on the property, and any other item in which a weapon or any other unauthorized item may be hidden. Employee should not maintain an expectancy of privacy on Company property.

Driving Record and Auto Insurance

Employees in positions where the operation of a motor vehicle is an essential duty of the position must present and maintain a valid driver's license, proof of insurance and maintain an acceptable driving record. Similarly, an employee must have a valid driver's license to operate Hillman vehicles on or off the premises.

The Company expects employees to follow traffic laws and refrain from violating them in the course of driving on Company business. An employee's driving record may be reviewed from time to time as a condition of employment. Changes in your driving record must be reported to your manager and Human Resources immediately.

The Company does not provide personal auto insurance coverage to employees. It is required that employees operating their own vehicles for Company business have \$250,000 per person for bodily injury, \$500,000 bodily injury per accident, \$250,000 per claim property damage or \$300,000 combined single limit. Personal policies limits vary in structure.

Violations of this policy may result in immediate termination of your employment.

Company Technology, Telephone, and Social Media

The Hillman Group provides a computer network, email system, Internet access, and related electronic resources ("Electronic Resources") to help you do your job. These electronic resources represent a significant commitment of resources by Hillman.

Specific details regarding Hillman's Information Technology, Telephone and Social Media Policies can be found by clicking [here](#). Please take the time to read and understand the policy and implications if you fail to abide by them.

Company & Personal Cell Phone & Mobile Devices

This policy outlines the use of personal cell phones while on company business, including special issues related to camera phones, the personal use of business cell phones and the safe use of cell phones by employees while driving. Please click [here](#) to read the policy in its entirety.

Harassment Policy

Hillman firmly believes that all employees should be able to enjoy a work environment free from all forms of discrimination, including harassment from supervisors, co-workers, vendors, consultants, visitors or Hillman's customers. Harassment is prohibited on any basis, including but not limited to an individual's age, race, color, national origin, ancestry, religion, disability, sexual orientation preference, marital status, military status, genetic information, or other protected group status. The conduct giving rise to harassment can occur not only in the workplace but also at company-sponsored business and social events. Harassment via social media, e-mail and text messages are all within the scope of prohibited conduct.

Hillman does not tolerate abusive conduct, bullying or other intimidating or aggressive behavior among employees or others covered by this Policy, whether or not it is based on a protected category. If an employee is found to be mistreating his or her colleagues, we will take appropriate

action to stop the behavior. If you experience or observe bullying, you may contact your manager or the Human Resources department

For further details on what is harassment as well as the consequences, please see the Harassment Policy.

Workplace Conduct

Hillman is committed to maintaining a safe and productive workplace. "Workplace" includes all Company and client property including, without limitation, the parking lot, break room, all public areas such as lobby and restrooms, and all off-site locations (including customer locations) where employees perform work for Hillman. To support this goal, all employees are expected to comply with work rules that will protect the interests and safety of employees and the Company. In addition, individual departments may establish additional work rules and procedures that are applicable to their unique operations. To learn more about the workplace conduct at your facility, please see your HR Representative.

Counseling and Disciplinary Action

Hillman encourages open communication between employees and supervisors. Employees are expected to comply with Hillman's standards of conduct and performance. Hillman is committed to administering equitable and consistent discipline for any unsatisfactory conduct or performance in the workplace. Supervisors will endeavor to address all noncompliance with established standards in a timely and equitable manner.

Employees are responsible for knowing and complying with Hillman's standards of conduct and performance. Employees are encouraged to address questions and concerns to their supervisor or a member of the Human Resources Department.

Supervisors shall address minor issues on a daily basis to help prevent them from becoming serious problems. Supervisors will meet with employees in private to discuss the nature of the problem and action necessary to correct it. Employees are encouraged to actively participate in counseling and performance improvement meetings and comply with supervisor corrections. Failure to do so will result in further disciplinary action up to and including termination of employment.

Hillman recognizes that there are certain types of occurrences that warrant more severe discipline or an immediate discharge. Nothing in this policy precludes bypassing a disciplinary step if warranted by the nature of the infraction. Immediate termination may be warranted in some circumstances.

Off-Duty Conduct

Hillman does not have any interest in attempting to control your personal life. However, your work environment includes times when you are at Company functions, when you are together as a group outside of work, and when you are representing the Company at social and business settings. As a general rule, what you do when you are not at the office matters if it negatively impacts our customers, potential customers, employees, potential employees or our reputation in the community or industry. For example, if you go to dinner with a client and say something offensive to the client or his guest, your conduct may result in that client choosing not to deal with

us anymore. Moreover, if you go out for drinks after work and engage in sexually offensive conduct with a co-worker or subordinate, your conduct may negatively impact your relationship with others at work or compromise your ability to lead others.

In such scenarios, if the Company or our employees are negatively impacted by your off-duty conduct, the occurrence will be investigated and you may be disciplined, up to and including termination.

Outside Employment

Hillman does not object to employees accepting outside jobs as long as they don't interfere with the employee's scheduled work hours, including assigned overtime or on-call duty and do not negatively affect the employee's ability to adequately perform the requirements of the position. Outside employment must not represent a conflict of interest or violate the terms of Hillman's Code of Business Conduct and Ethics Policy or any applicable agreement.

Employees who have reason to believe that an outside employment opportunity may violate this policy should obtain advance approval from their manager in conjunction with the Human Resources Department. Employees who accept or perform an outside job that results in a failure to perform their job requirements satisfactorily, or in any way violates this policy or the Code of Business Conduct and Ethics Policy will be subject to immediate disciplinary action, up to and including termination of employment.

If an employee's outside employment presents a conflict of interest with Hillman as defined in the Conflict of Interest Policy, or if such outside employment has any potential for negative impact on Hillman, the employee will be asked to terminate the outside employment.

Smoking and Tobacco Products

In keeping with Hillman's goal of a safe and healthy work environment, and in compliance with local and state laws, Hillman is a nicotine free campus. Nicotine use will be strictly prohibited at all Hillman facilities. This policy applies to all employees, clients, contractors, and visitors. This includes but is not limited to - cigarettes, cigars, pipes, chewing tobacco, supari, vapor device and e-cigarettes.

Solicitation

Persons not employed by Hillman may not solicit or distribute literature on Hillman's premises or in the workplace at any time for any purpose without Human Resources' authorization.

Hillman recognizes that employees may have an interest in events and organizations outside the workplace. However, employees may not solicit, distribute, or e-mail literature regarding these activities during work time, or in working areas. (Work time does not include lunch periods, breaks, or any other periods in which employees are not on duty.)

In addition, employees may not post written solicitations or information of any sort on Company bulletin boards or any other location within Hillman's premises. Only the Human Resources Department may post notices or materials on the premises.

Dress and Personal Appearance

Hillman Smart Casual

Hillman embraces a “Smart Casual” dress code. This is a relaxed and informal dress code that enables our employees to work comfortably in the workplace, but that maintains standards for neat and appropriate attire allowing for a casual, but professional appearance at work. Employees are expected to maintain a clean and ordered appearance at all times, dressing in a manner appropriate for the work being performed and consistent with safety rules and considerations. Workplace attire must not serve as a distraction to other employees, customers or other visitors. Acceptable personal appearance, like proper maintenance of work areas, is an ongoing requirement of employment with Hillman.

Office and Field

Appropriate smart casual clothing includes but is not limited to: jeans, khakis, twill, or other casual pants or skirts that are not faded and are in good repair; seasonal blouses, shirts, sweaters, and collared shirts; and Hillman branded items. Unacceptable choices include but are not limited to: worn, dirty, or frayed garments; clothing that reveals cleavage, back, chest, stomach, or underwear; shorts of any kind (except field employees as approved by managers), or very short skirts; tops that have spaghetti straps; halter or tank tops; muscle shirts, unless covered by another layer; clothing that is transparent or see-through; and workout wear. Employees who prefer to dress in business casual or traditional business attire should feel free to do so.

Operations

Manufacturing and distribution employees may dress more casually consistent with safety rules and considerations appropriate for the nature of the work. Close toed/low or no heel shoes are required in the facility. Some areas may require long pants for safety reasons. Unacceptable choices include but are not limited to: clothing that reveals cleavage, back, chest, stomach, or underwear; very short skirts or shorts; tops that have spaghetti straps, halter or tank tops, or are muscle shirts, unless covered by another layer; and clothing that is transparent or see-through.

All Employees

Any clothing that has words, terms, or pictures that may violate a Hillman policy, such as the Non-Harassment Statement and Equal Employment Opportunity policy, is unacceptable. Reasonable accommodation will be made for aspects of dress associated with a person’s religious beliefs, or disabilities, whenever possible. Employees are expected to maintain an acceptable level of personal hygiene. Remember that some employees are allergic to the chemicals in perfumes, scented body sprays, or similar items, so wear these substances with restraint.

Additionally, when you are representing the company, the occasion might require business casual or formal business attire. On occasions when a customer or a business partner visits the office, the employee groups with whom the visitor is interacting may need to adhere to business casual standards.

No dress code can cover all contingencies so employees must exert a certain amount of judgment in their choice of clothing to wear to work. If you experience uncertainty about acceptable smart casual attire for work, please ask your supervisor or your Human Resources staff. If clothing fails to meet these standards, as determined by the employee’s supervisor and Human Resources, the employee will be asked not to wear the inappropriate item to work again, and the employee may be sent home to change clothes. In that event, policies about personal

time use may apply. Additional disciplinary action up to and including termination will occur if dress code violations continue.

Attendance and Punctuality

To maintain a productive and safe work environment, Hillman expects employees to be reliable and punctual in reporting for scheduled work. Absenteeism and tardiness place a burden on other employees and on Hillman. The Company acknowledges that certain circumstances will cause employees to miss work or arrive late, however employees are expected to minimize such occurrences and remain within established guidelines. The Attendance Policy can be found by clicking [here](#).

Drug Free Workplace

Hillman believes it is very important to provide a safe, healthy, and productive workplace. Employee use of illegal drugs or abuse of legal drugs and alcohol is a source of danger in the workplace. Hillman can't condone and won't tolerate behaviors on the part of employees that relate to substance use, such as: sale, purchase, transfer, trafficking, possession, or use of illegal drugs or alcohol; reporting to work or working under the influence of any drug (legal or illegal) or alcohol. For purposes of this policy, "illegal drugs" means any substance defined as illegal under federal, state and/or local law. The term "illegal drugs" also includes legal substances, such as prescriptions, obtained illegally and/or used in an unauthorized manner.

Prohibitions. Hillman's Drug Free Workplace expressly and strictly prohibits the possession, use, sale, purchase, transfer, or trafficking of illegal drugs or alcohol during work hours, while on Company premises, while on Company business (including but not limited to customer and vendor facilities), or while using a Company supplied vehicle or driving your own vehicle on Company business.

Drug Testing. The Drug Free Workplace Policy mandates that applicants and employees may be subject to drug screening, and employees may be subject to certain alcohol impairment screening as a condition of employment. Hillman will comply with all state and local requirements in administering the screenings.

It is a violation of Company policy for employees to have measurable amounts of the urinary by-products (or other medically acceptable means of assessment) of illegal drug or the metabolite of the substance. "Unauthorized drugs" does not include any drugs lawfully prescribed by a health care provider and used as a prescribed (see below for prescription use rules). The presence of urinary by-products of unauthorized drugs is a sufficiently strong indication of detrimental drug influence to warrant the denial of employment for applicants or the imposition of disciplinary action up to and including discharge for employees. An employee who adulterates, attempts to adulterate, substitutes a specimen, submits an adulterated specimen, or otherwise manipulates the testing process will be terminated. Refusing to submit to an inspection or search of your person or your locker, desk, or other Company property under your control, or your personal vehicle while on Company premises is a violation of this policy. Refusal to submit to a required alcohol or drug test will be considered a "positive" test. "Refusal" includes, but is not limited to, failing to: (1) appear for any test within a reasonable time, as determined by the Company; (2) remain at the testing site until the testing process is complete; (3) provide a urine specimen for any drug test; (4) in the case of a directly observed or monitored collection in a drug test, permit the observation or monitoring; (5) provide a sufficient amount of urine when directed, unless there

is an adequate medical explanation for the failure; (6) take a second test as directed; or (7) cooperate with any part of the testing process.

Prescriptions. Employees must notify their supervisor of any temporary use of prescribed or over-the-counter medication that may adversely affect your behavior or mental or physical ability to perform your job duties, or which may adversely affect and/or endanger your safety or the safety of others, prior to engaging in work while under the influence of such medication. You must provide your supervisor or Human Resources with a letter from your physician stating: (1) that the use is pursuant to the physician's instructions; (2) the possible adverse effects; (3) whether the medication adversely affects your ability to safely perform your job duties; and (4) the expected duration of use. If it is appropriate and/or deemed necessary by your supervisor and/or Human Resources, you may be assigned to other duties or otherwise reasonably accommodated until you are no longer using such medication or until it is deemed appropriate with regard to the safety and well-being of all concerned individuals. You must keep any prescribed medication in its original container.

If an employee violates the Drug Free Workplace Policy by **any** of the actions described above, Hillman will take immediate measures to enact discipline, up to and including termination. However, Hillman believes in offering assistance to employees who pro-actively seek treatment for a substance abuse problem **before** being asked to submit to a drug or alcohol test or violating this policy. A Human Resources representative will meet with employees who voluntarily come forward with a substance abuse problem to discuss the situation. The Human Resources Department can provide information on drug and/or alcohol assessment and treatment programs. Employees who voluntarily submit to a drug or alcohol rehabilitation program may request a leave of absence.

Employees who have questions or concerns about substance use or abuse are encouraged to speak with their supervisor or a member of the Human Resources Department.

Workplace Safety



Hillman is firmly committed to providing a safe and healthy work environment for employees, customers, and visitors. We believe that all accidents are preventable. To support this commitment, Hillman has established a comprehensive workplace safety program. The vision of this program is to be known for safety with our employees, customers and the community at large, wherever we do business. This program is a core value for the Company; its success depends on the personal commitment of all employees.

Hillman has established multiple safety teams across the organization. The Global Leadership Safety Team (GLST) includes the CEO, the GLST scope is to establish the framework for the safety performance culture, provide resources, remove roadblocks and assure leadership accountability for safety.

All employees receive ongoing safety training that includes company policies/guidelines and emergency procedures including: building evacuation, safe work practices and federal, state and/or local requirements. Hillman also provides regular communications about safety and health topics via meetings, safety grams, bulletin board postings, a safety portal on the Hillman Intranet site and other means of communication.

Some of the best safety improvement ideas come from employees. Employees who have ideas, concerns, or suggestions are encouraged to contact their supervisor or a member of the site or department safety team. All reports can be made without fear of reprisal.

Hillman Safety Rules

All employees are expected to obey company and customer safety rules and exercise caution in all work activities.

Employees must immediately report any unsafe condition to the appropriate supervisor. Employees who violate safety standards or function-specific rules and/or training, cause or fail to report an accident and/or hazardous situation, or otherwise function in an unsafe manner may be subject to disciplinary action, up to and including termination of employment.

Employees who are involved in incidents resulting in injury or property damage will be required to submit to a drug screen as outline in Hillman's workplace incident policies.

Each Safety Plan which can be found on the Hillman Safety portal identifies expectations and rules which are intended to serve as a guideline for safe work practices and behaviors. These Safety plans were developed to provide basic safety information for work environments based on prudent safety procedures and safety regulations. Safety rules are also helpful tools for initial safety training but should not be considered as complete and may not include all necessary precautionary measures. Employees are expected to follow general safety rules, facility-specific safety rules and function-specific training developed for each job.

Workplace Accident/Injury Reporting and Investigation

Hillman is committed to conducting a comprehensive investigation of each incident and ensuring that every reasonable effort is made to identify the root cause and take appropriate corrective action to minimize or eliminate hazards. Hillman will work closely with injured employees to confirm that they receive appropriate medical treatment and temporary transitional duty assignments if required and available.

Employees must immediately report the following to their supervisor:

- on-the job injuries or illnesses (even if the employee does not require medical treatment),
- accidents (even if there is no injury),
- near hits and damage to company property

First report to your immediate supervisor. It is then required to provide written reports including pictures, and other applicable documentation through the safety portal.

Work Related Accidents and Injuries

Hillman provides a workers' compensation insurance program at no cost to employees. This program covers any eligible injury or illness sustained in the course of employment that requires medical, surgical, or hospital treatment, including medical bills and time lost from work, subject to the terms and conditions defined by State specific regulations.

Employees must report all hazardous conditions to their supervisor; notify their supervisor immediately after a work-related accident, illness, injury, or near hit occurs (even if there is no injury); comply with Hillman's Exposure Control Plan (blood borne pathogens); report for post-accident drug tests; comply with any light duty restrictions; provide all written physician reports; assist as requested with accident investigations; comply with all instructions issued by the physician, insurance company, and Human Resources staff.

Employees will be paid for the time spent during their **initial visit** to the doctor on the day the incident occurs, not to exceed the number of hours in a regularly scheduled workday. Time for subsequent visits will not be paid; however, employees have the following options: schedule the appointment during non-work time, use paid personal or vacation time, or make a temporary change to the work schedule to make up the time in the same work week.

Employees who are instructed by a physician to take time off from work may be eligible to apply for workers' compensation pay. Hillman's insurance carrier administers lost time claims in accordance with state law. The insurance adjustor will explain the employee's rights and obligations after the claim is filed. Employees will continue to receive elected benefits during the time off and must pay the employee portion of the premium. For eligible employees, the time off will be applied against the 12 weeks allowed under the Family Medical Leave Act. If this occurs, the Human Resources Department will notify the employee in writing (refer to Family Medical Leave Act Policy).

Hillman will not tolerate any attempts to fraudulently claim any type of workers' compensation benefits. Any such activity will subject the employee to disciplinary action up to and including termination of employment and will also be referred to the appropriate State fraudulent claims investigators.

Medical Examination/Interests of Health and Safety

Hillman requires that its employees not pose a threat of harm to themselves, other employees or the public. If at any time, the Company determines that an employee's mental or physical condition poses a direct threat to the health or safety of the employee, other employees or the public, the Company may require that the employee submit to a medical examination by a doctor selected by the Company. If such examination is required, it shall be paid for by the Company. The employee will not lose any regular pay he or she would have otherwise received as a result of time reasonably spent in attending the examination.

If you return to work for the Company after a lengthy absence due to a serious health condition, the Company may require that you submit to a fitness for duty examination by a doctor selected and paid for by the Company, to make sure that you are capable of performing the essential functions of your job and to determine what type of accommodation, if any, is necessary for you to perform your job. If an accommodation is necessary, the Company will work with you to explore the situation and determine whether reasonable accommodation can be provided.

If your physician has placed any medical restrictions on you, then you are **required** to adhere to those restrictions. You are **prohibited** from doing any work which exceeds your medical restriction. If you believe that any aspect of your job will require you to violate your medical restrictions, you should immediately notify your supervisor. If your supervisor is unavailable or you are uncomfortable contacting your supervisor, then you should immediately notify Human Resources.

Workplace Security

Hillman considers all aspects of workplace security to be a high priority. The Company strives to provide a professional, dedicated approach to security to ensure that each facility and off-site department has an approved plan that will minimize risk to employees, customers and assets. The following guidelines apply to all facilities.

Visitors

To provide for the safety and security of employees and Company facilities, only authorized visitors are allowed on the premises. Restricting unauthorized visitors helps maintain safety standards, protects against theft, ensures the security of equipment, helps secure confidential information, safeguards employee welfare, and avoids potential distractions and disturbances. All visitors must enter the building at the facility's designated visitor entrance. Authorized visitors will receive a visitor badge and directions or escort to their destination. Children are not permitted in manufacturing or distribution work areas. Employees are responsible for the conduct and safety of their visitors. If employees observe an unauthorized individual on the premises, they should immediately notify their supervisor or the Receptionist and direct the individual to the main entrance.

Violence Prevention

Hillman always expects all employees to treat others with courtesy and respect. Any employee who threatens violence, engages in violence, or engages in intimidating behavior in the workplace is in violation of our policy. The workplace is defined as all Company and client property including, without limitation, the parking lot, break room, and all public areas such as lobby and restrooms. The following conduct is prohibited:

- Fighting, physical violence, stalking, horseplay, use of abusive language, sabotage of another's work, harmful misuse of equipment of other Company property, or any other disruptive activity in the workplace.
- Conduct that threatens, intimidates, or coerces employees, customers, or members of the public at any time, including off-duty periods.
- Bringing weapons, firearms, explosives or dangerous materials onto Company or customer property, including Company parking lots (unless dictated otherwise by state law). This also applies to visitors, except in the case of civil authorities.

Threats or acts of violence directed to the Company, its supervisors, employees, customers or vendors, even if made off-duty, may result in disciplinary action under this policy if reasonably construed to impact workplace safety and security.

Hillman encourages employees to bring disputes or differences with other employees to the attention of their supervisor or the Human Resources Department before the situation escalates into potential violence. Hillman is eager to assist with the resolution of employee disputes and will not retaliate against employees for raising such concerns.

Employees are required to report all threats of (or actual) violence, both direct and indirect, to their supervisor or any other member of management. This includes actions by employees, customers, vendors, solicitors, or other members of the public. When reporting a threat or actual violence, be as specific and detailed as possible. The identity of the individual making a report will be protected as much as practical.

Employees are also expected to report all suspicious individuals or activities to a supervisor or the Receptionist. Do not place yourself in peril. If you see or hear a commotion or disturbance, do not try to intercede.

If you apply for or obtain a protective or restraining order which lists Company or client property as being protected areas, you must provide a copy of the order, as well as the petition, motions, counter memoranda and affidavits use to seek the order to the Human Resources Department and your supervisor.

Hillman will promptly and thoroughly investigate all reports of threats of (or actual) violence and of suspicious individuals or activities. In order to maintain workplace safety and the integrity of its

investigation, Hillman may suspend employees, either with or without pay, pending investigation. Employees who are determined to be responsible for threats of (or actual) violence or other conduct that is in violation of these guidelines will be subject to disciplinary action up to and including termination of employment.

Workplace Monitoring

Hillman may monitor the premises for a variety of reasons such as employee safety, security, quality control and customer satisfaction. Because Hillman is sensitive to the legitimate privacy rights of employees, we will strive to conduct workplace monitoring in an ethical and respectful manner.

Hillman may conduct video surveillance of non-private workplace areas. Video monitoring is generally used to identify safety concerns, maintain quality control, detect theft and misconduct, and discourage or prevent acts of harassment and workplace violence. Company computers and electronic files may be monitored or accessed at Hillman's sole discretion.

Hillman provides desks, lockers, and other storage areas for the convenience of employees, and all such items remain the sole property of Hillman. Accordingly, Hillman or any designated representative may inspect any item as well as any articles found within them at any time, either with or without prior notice.

Hillman may monitor or record the telephone conversations of employees who regularly communicate with customers. Telephone monitoring is generally used to identify and correct performance problems, in an effort to ensure that our customers have a positive impression of the Company and our services.

Hillman may monitor employee locations during work hours for business related purposes using GPS technology.

Refusing to consent to a workplace search may result in discipline, up to and including termination.

Workplace Entry

For the sites that have Access Control Badge Systems team members must scan their badge every time they enter the building. Additionally, team members are expected to wear their badge at all times while on campus. If you are entering the building and others are behind you, make sure they have a badge and scan it before entering the building. If the person doesn't have a badge, they must check in through the main lobby. There is a phone in the front lobby vestibule and a directory that they can utilize to reach a supervisor prior to entry.

If you see any suspicious activities in or around the campus, inform the nearest manager or supervisor.

Emergency Facility Closings

At times, emergencies such as severe weather, fire, power failure, earthquake, or a threat to security, etc., can disrupt Company operations. In extreme cases, these circumstances may require the closing of a work facility. Hillman will notify employees as soon as practical in the event of a closing. Larger facilities may have a hotline number or other mass communication forms posted that employees can call for schedule updates during emergency conditions.

When a work facility is officially closed due to emergency conditions, the time off from scheduled work will be unpaid. However, with supervisor approval, employees may use any available paid personal or vacation time.

Addendums

ACCESS TO EMPLOYEE EXPOSURE AND MEDICAL RECORDS

The Occupational Safety and Health Administration (OSHA) requires employers to inform employees upon their first entering into employment, and at least annually thereafter, of:

- The existence, location and availability of any employee medical and exposure records
- The person responsible for maintaining and providing access to records
- Each employee's rights of access to the records

Copies of the following records may be contained, which is maintained by and may be accessed through Safety Risk Analyst:

- Accident/Incident Reports involving an accident or injury
- Workers' Compensation claims and reports
- Physician reports related to Workers' Compensation cases
- Drug and alcohol test reports
- HBV and other bloodborne pathogen test reports
- Other medical evaluation reports that may be sent to Hillman

Copies of the following records are maintained by and may be accessed through the Safety Risk Analyst:

- Indoor air quality monitoring and testing reports
- Noise exposure reports
- Chemical exposure test reports

As an employee, you have the right of access to these records, i.e., you have the right and opportunity to examine and copy your medical and exposure records at no cost to you. Access must be provided to you in a reasonable manner and place. If you are not provided the material within 15 days after your request, The Hillman Group must state the reason for the delay and the earliest date when the records will be made available. If no exposure records exist for you, The Hillman Group must provide the records of other employees with job duties similar to yours. Access to these records does not require the written consent of the other employees. Such exposure records must indicate the identity, amount and nature of the toxic substances or harmful physical agents to which you have been exposed. Access to your medical records by other employees may be provided only with your specific written consent.

A copy of the OSHA rule (found at Title 29 of the Code of Federal Regulations, Part 1910, Section 1020) and its appendices may be accessed at the following link:

https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10027

EXHIBIT D

McNamara, Anthony P.

From: Cornett, Jason <Jason.Cornett@hillmangroup.com>
Sent: Wednesday, July 17, 2019 7:06 PM
To: Weber, Mark; Schaeper, Tia
Subject: Connect tomorrow am?

Mark –

How early can we connect tomorrow (Thu) am? We think we have a problem with a new employee's cultural fit at Hillman. Based on 3 days experience, we think it's probably best to part ways before we get into a more challenging, complicated situation for the new employee and us.

We can share context & details when we connect tomorrow.

Jason Cornett | [Director – Supply Chain Planning & Network Design](#)

The Hillman Group

10590 Hamilton Avenue | Cincinnati, Ohio 45231

Office: 513.826.0828 | **Mobile:** 513.368.8312

Email: jason.cornett@hillmangroup.com



EXHIBIT E

McNamara, Anthony P.

From: Weber, Mark <Mark.Weber@hillmangroup.com>
Sent: Thursday, July 18, 2019 11:36 AM
To: Weber, Mark
Subject: Notes

Meeting with Eran Evans on 7-18.-19

Received an email from Jason stating that he needed to talk to me regarding an new hire. I responded and told him I was available anytime. He called my from Rialto as did Tia joined the call. He informed me that he had spoken with Kim on Wednesday night and they had agreed that Eran had not shown the interest in working for Hillman and would like to part ways prior to adding more time to the training program.

I met with Eran to review how things were going and no issues were mentioned. Tia brought several issues to her attention:

1. Phone / texting during meeting
2. Lack of interest in training
3. Lack of interest / questions during training
4. Please see Tas's notes.

During the talk with Eran, she indicated the following issues:

1. Health Issues, nothing particular noted, but said she has health issues
2. Vision issues, said she could not see the screen and was having to squint
3. Son issues, had an incident with son that needed to be handled.

Upon completion of discussion, Tia left the room, I open the floor for clarification and questions. She had none, other than to state that this was a clear demonstration of discrimination, and that I would hear from her.

I walked her to the door and said thank you.

Mark Weber | Human Resource Business Partner

The Hillman Group

10590 Hamilton Ave. | Cincinnati, OH 45231

Office: 513.975.5230 | Email: mark.weber@hillmangroup.com



EXHIBIT F

McNamara, Anthony P.

From: Schaeper, Tia
Sent: Friday, October 4, 2019 12:12 PM
To: Corbitt, Kim
Subject: RE: Termination

Thank you

From: Corbitt, Kim
Sent: Friday, October 4, 2019 12:12 PM
To: Schaeper, Tia; Weber, Mark
Cc: Cornett, Jason
Subject: RE: Termination

Hi Tia,

I will get Legal looped in and they'll lead the process.

Thanks for sending it on, be in touch soon.

KC

From: Schaeper, Tia <Tia.Schaeper@hillmangroup.com>
Sent: Friday, October 4, 2019 11:12 AM
To: Weber, Mark <Mark.Weber@hillmangroup.com>; Corbitt, Kim <Kim.Corbitt@hillmangroup.com>
Cc: Cornett, Jason <Jason.Cornett@hillmangroup.com>
Subject: RE: Termination

Mark and Kim,

When I got into work this morning I had a sealed letter on my desk from an attorney's office regarding the termination of Eran Evans. I will be dropping this letter off to you this morning.

If you need me to distinguish between the facts and falsities in the letter I will be happy to do so. The summary is she is seeking monetary compensation and filing claims against 1) racial discrimination and 2) personal liability.

I have never encountered anything like this before and will need your assistance in understanding what next steps are. I'm sorry to inform you of this and look forward to resolving quickly.

Thanks,
Tia

From: Schaeper, Tia
Sent: Thursday, July 18, 2019 2:46 PM
To: Weber, Mark; Cornett, Jason
Subject: RE: Termination

Hi Mark,



HILL-EVANS-000559

From my perspective here is how I would describe how the meeting today with Erin went:

- I kicked off the meeting first by acknowledging the purpose: to address some observations I have had in her onboarding thus far, and acknowledged the presence of Mark as he has been involved with her onboarding as well
- I expressed my observations this early on have been she seems “unhappy” and “disinterested” in her role here at Hillman
- I explained we are trying to foster a culture of energy and excitement towards operational excellence and supporting each other and our customers and that I felt she was not aligned
- I was direct in saying I felt it was best for us to part ways
- She had an opportunity to respond, noting that she has been interested and asked for examples
- I mentioned the meeting where she was on her phone the entire time and noted her body language and lack of discretion (and noted it was observed by her peers as well)
- She responded it was a family issue she had to address
- She went on to explain she has vision issues so she could not see(?) my screen in a training I did with her Wednesday afternoon and that’s why her facial expression was flat
- She expressed her inability to be engaged in meetings was due to the fact she is new and doesn’t yet understand the business
- She mentioned the training seemed “out of order” or not sequential in topics
- I reiterated my opinion that her lack of engagement and interest was not a good fit for Hillman and at this point I believe it is for the best we part ways.
- Left the room and allowed her to ask any remaining questions to Mark without me present.

From: Weber, Mark

Sent: Thursday, July 18, 2019 9:48 AM

To: Cornett, Jason

Cc: Schaeper, Tia

Subject: RE: Termination

Tia,

Please send me a recap of the meeting from your perspective.

Thanks

From: Cornett, Jason

Sent: Thursday, July 18, 2019 9:33 AM

To: Weber, Mark <Mark.Weber@hillmangroup.com>

Cc: Corbitt, Kim <Kim.Corbitt@hillmangroup.com>; Kitzberger, Amanda <Amanda.Kitzberger@hillmangroup.com>; Schaeper, Tia <Tia.Schaeper@hillmangroup.com>

Subject: RE: Termination

Mark –

Thanks for your help with this. Tia & I will connect with you to ensure we understand next steps for us.

Jason Cornett | Director – Supply Chain Planning & Network Design

The Hillman Group

10590 Hamilton Avenue | Cincinnati, Ohio 45231

Office: 513.826.0828 | **Mobile:** 513.368.8312

Email: jason.cornett@hillmangroup.com



From: Weber, Mark

Sent: Thursday, July 18, 2019 9:19 AM

To: Cornett, Jason <Jason.Cornett@hillmangroup.com>

Cc: Corbitt, Kim <Kim.Corbitt@hillmangroup.com>; Kitzberger, Amanda <Amanda.Kitzberger@hillmangroup.com>; Schaeper, Tia <Tia.Schaeper@hillmangroup.com>

Subject: Termination

Jason

We have completed the termination of Eran Evans. As you know Eran just began on Monday, however the indications were that she was not engaged in the position and had a lack of interest. After meeting with her and Tia, Eran indicated that this was form of discrimination and that we would hear more from her.

Thanks,

Mark Weber | Human Resource Business Partner
The Hillman Group

10590 Hamilton Ave. | Cincinnati, OH 45231

Office: 513.975.5230 | Email: mark.weber@hillmangroup.com

